

# **EXHIBIT 26**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW JERSEY

- - -

IN RE: JOHNSON & :  
JOHNSON TALCUM POWDER :  
PRODUCTS MARKETING, :  
SALES PRACTICES, AND : NO. 16-2738  
PRODUCTS LIABILITY : (FLW) (LHG)  
LITIGATION :  
: THIS DOCUMENT RELATES :  
TO ALL CASES :  
:

- - -

January 21, 2019

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Videotaped deposition of  
JUDITH ZELIKOFF Ph.D., taken pursuant to  
notice, was held at the Sheraton Mahwah  
Hotel, 1 International Boulevard, Mahwah,  
New Jersey, beginning at 9:11 a.m., on  
the above date, before Michelle L. Gray,  
a Registered Professional Reporter,  
Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

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1           Q.     Did you do analysis of  
2     biologic plausibility for talc without  
3     asbestos?

4                 MS. O'DELL: Objection to  
5     form.

6                 THE WITNESS: My biological  
7     assessment, my -- my biological  
8     plausibility was looking at the  
9     entire product of talcum powder.

10 BY MR. HEGARTY:

11           Q.     And how do you define the  
12    entire product?

13           A.     The entire product is  
14    whatever are the ingredients or listed  
15    within the documents or the test results  
16    from Imerys that -- that indicate what  
17    they measured, including the metals, the  
18    asbestos, the -- the asbestiform fibers,  
19    the fragrances.

20           Q.     So you did your biologic  
21    plausibility analysis with -- based on  
22    talc that has asbestos, heavy metals and  
23    fragrance in it, correct?

24                 MS. O'DELL: Objection to

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1 form.

2 THE WITNESS: I did my  
3 biological plausibility on talcum  
4 powder products.

5 I looked at individual  
6 products, individual constituents  
7 in adding to my -- to my report,  
8 to my document. But I looked at  
9 the entire product. And it is my  
10 opinion that the entire product  
11 causes inflammation and that  
12 inflammation then goes on as a  
13 triggering mechanism to turn on  
14 certain genes and to bind iron  
15 that can lead to the changes  
16 needed for cancer in the ovary.

17 BY MR. HEGARTY:

18 Q. You did not do a separate  
19 analysis of talc without asbestos or  
20 without -- and without heavy metals and  
21 without fragrance, correct?

22 MS. O'DELL: Object to the  
23 form.

24 THE WITNESS: I'm not even

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1           sure how that would be done or I  
2           don't think it could be done.

3                   What I did was I did it for  
4                   the entire product.

5 BY MR. HEGARTY:

6           Q.       And what do you -- what do  
7       you think -- what is your opinion --  
8       strike that.

9                   What is in the entire  
10      product in your opinion?

11          A.       Based upon the Johnson &  
12      Johnson documents. That's where my --  
13      that's where I will tell you what is in  
14      there.

15                   As -- as far as the product  
16      documents, it indicates that there are  
17      metals, including -- not -- not totally  
18      inclusive of, but to mention a few of the  
19      more well-known ones, cobalt, chromium  
20      and nickel.

21                   There are also, according to  
22      the Crowley report, there are also many  
23      chemicals that make up a fragrance. And  
24      there -- and in many of the samples

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1 of that. However many of the documents  
2 and many of the studies including the  
3 Longo supplement did compare, for  
4 example, I think I misspoke when I said  
5 one of the places that Johnson & Johnson  
6 gets their talc is Korea. What I meant  
7 was China. I should have said Asia. So  
8 Korea is also a mine that provided, but  
9 not to Johnson & Johnson.

10 MS. O'DELL: Hey, Mark,  
11 we've been going about an hour and  
12 15 minutes.

13 MR. HEGARTY: Okay.

14 MS. O'DELL: Can we take a  
15 break?

16 MR. HEGARTY: Yeah.

17 THE VIDEOGRAPHER: The time  
18 is 2:27 p.m. Off the record.

19 (Short break.)

20 THE VIDEOGRAPHER: We are  
21 back on the record. The time is  
22 2:45 p.m.

23 BY MR. HEGARTY:

24 Q. Doctor, if evidence was that

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1       there is no asbestos in Johnson's Baby  
2       Powder, would that change your opinions  
3       as to biological plausibility?

4           A.     No, sir, it would not.

5           Q.     Same question with regard to  
6       heavy metals. If there were no heavy  
7       metals in Johnson's Baby Powder, would  
8       that change your opinions on biological  
9       plausibility?

10          A.     I looked at the entire  
11       product and it would not -- it would not  
12       change my opinion, as it exists  
13       currently, with biological plausibility  
14       that it would cause ovarian cancer  
15       through -- through inflammation, is my  
16       opinion.

17          Q.     In looking at your heavy  
18       metals section, beginning at Page 8 of  
19       your report -- are you there?

20          A.     I'm not. I had to put my  
21       glasses on. Thank you.

22          Q.     There are no studies that  
23       have looked at the effects of these  
24       metals in powder dusted on the perineum,